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April 2, 2002

SCANNED

Mr. Michael Moran
Massachusetts Department of Environmental Protection
Southeast Regional Office
20 Riverside Drive
Lakeville, Massachusetts 02347

*RE: Immediate Response Action Modification
American Auto Auction
123 Williams Street
North Dighton, Massachusetts
DEP RTN No. 4-16565*

Dear Mr. Moran:

On behalf of American Auto Auction, *SAGE* Environmental, Inc. (*SAGE*) submits the following Immediate Response Action (IRA) Modification for the referenced release.

Your office was notified of an IRA condition on September 16, 2001, subsequent to field identification of polychlorinated biphenyl (PCB) transformer oils which were released to an drainage swale and associated wetland as a result of a fire. An IRA Plan was subsequently submitted to your office on October 31, 2001. An IRA Status Report was submitted to your office on January 16, 2002.

Background

A spill of transformer oils, some of which contained PCBs, occurred as a result of a fire at the referenced property in September 2001. The transformer oils were washed via fire suppression water into a drainage swale and extended approximately ¼-miles downstream. Separate phase transformer oil and oil impacted sediments within the streambed were removed this past Fall. Post clean-up confirmation sampling revealed a small area that requires additional excavation to decrease contaminant concentrations

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below clean-up and/or background standards with regard to extractable petroleum hydrocarbons (EPH) constituents.

In addition, during the subsequent removal of fire debris from the former Taunton Expo, asbestos was detected as a constituent of the fire debris, requiring the disposal of all fire debris as asbestos impacted waste.

Additional assessment activities are also required to fill in data gaps and provide data for Risk Characterization. A Site Location Plan is attached as **Figure 1**.

Specific IRA activities proposed under the IRA Modification are described below:

(1) Additional Clean-up Activities

EPH constituents, especially C11-C22 aromatics, above clean-up and/or background standards remain in the area of sample location MSW-1 (see attached **Figure 2**). An additional two inches of streambed soils will be hand excavated from this location. Following excavation, one confirmatory sample will be collected for analysis for PCBs, EPHs and asbestos. Asbestos is a potential constituent of concern due to the possibility that asbestos fibers were carried by the fire suppression water, along with PCBs, into the streambed. It is anticipated that any asbestos fibers so deposited on the surface of the streambed sediments would have been removed, along with the PCBs, as part of the previously completed remedial activities conducted under this IRA. Accordingly, asbestos will only be analyzed for in selected samples under this proposed work scope in order to test this hypothesis.

Asbestos in soil will be laboratory analyzed using Polarized Light Microscopy (PLM) for bulk asbestos analysis, in accordance with Massachusetts Department of Environmental Protection (MADEP)-Bureau of Waste Prevention (BWP) Asbestos Unit practice.

Lower concentrations in this area will assist in developing an opinion of No Significant Risk (NSR) and establishing a background EPH concentration. The excavated material will be drummed for appropriate off-site disposal.

(2) Stormwater Runoff Research

Given that EPHs are in Site soils/sediments, they require investigation and evaluation relative to the Massachusetts Contingency Plan (MCP). *SAGE's* Conceptual Site Model (CSM) envisions that EPH concentrations at the Site may be permissible (as background) within the MCP per Section 40.0317(7)(B) relating to historic parking lot runoff which contained EPHs.

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- a. Establish an EPH background concentration (a number of up and downstream samples have been collected – according to Risk Assessment professionals, additional samples will be necessary for their purposes). These additional sampling needs will be identified by Risk Assessors once the data associated with this IRA Modification is acquired; and
- b. Establish that the Site operator and previous site operators were in “compliance” with applicable stormwater discharge regulations.

Research will be conducted to evaluate the facility’s compliance status with regard to any applicable stormwater discharge regulations (see 310 CMR 40.0317(3)). This information will be necessary in support of future Site closure requirements.

(3) Missing Data Point- Confirmatory Stream Sediment Sampling

A post excavation confirmatory sediment sample will be collected at the 1,850-foot mark within the stream channel. This confirmatory sample was inadvertently omitted during the preliminary sampling. The sample will be analyzed for PCBs, EPH and asbestos by PLM by a Massachusetts-certified laboratory.

Three discrete sediment samples and one surface water sample will be collected from the downstream portion of the stream channel in the vicinity of sample location point SP-1. These samples will be analyzed for EPHs.

(4) Stormwater Runoff - PCB Exceedances

Due to a PCB level detected above the clean-up standard in a stormwater runoff sample collected west of the Expo building, three soil samples will be collected within the grass shoulder, downgradient from this sample collection point. These samples will be analyzed for PCBs, EPH and asbestos by PLM.

(5) Sumps/Drainage Structures

To evaluate whether previously discovered PCB concentrations above clean-up standards remain within on-site drainage structures, sediment and/or water samples will be collected from the sumps of three stormwater catch basins located within the area of runoff impact. These samples will be analyzed for PCBs, EPH and asbestos by PLM by a Massachusetts-certified laboratory. Consideration of analysis for asbestos will be deferred pending results of soil and surficial sediment analyses.

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(6) Groundwater PCB Impact Assessment

In support of future Site closure requirements groundwater will be assessed for the presence of PCBs and EPHs. One groundwater sample will be collected from an existing monitor well located within the area of runoff impact. Three new monitor wells will be installed in the previously impacted areas east of the Expo building. Groundwater samples will be collected and analyzed for PCBs and EPHs by a Massachusetts-certified laboratory. The location of the proposed monitor wells is depicted on **Figure 2**.

(7) Surface Water Sample/Analysis

In support of future Site closure requirements surface water will continue to be assessed for the presence of PCBs. A minimum of two additional surface water samples will be collected from the stream at the Tremont Street culvert. Samples collected from this point previously have not revealed PCBs above laboratory detection limits. To evaluate water quality relative to the chronic Ambient Water Quality Criteria for PCBs and EPHs, the samples will be analyzed using the lowest achievable analytical detection limit. Consideration of analysis of surface water samples for asbestos will be deferred until results of sediment analysis for asbestos have been received and reviewed.

(8) IRA Status Report or IRA Completion Report

Pursuant to the requirements of 310 CMR 40.0425 and 310 CMR 40.0427, either an IRA Status Report or IRA Completion Report will be prepared and submitted to the MADEP. The statutory deadline for the next IRA Status Report is July 16, 2002.

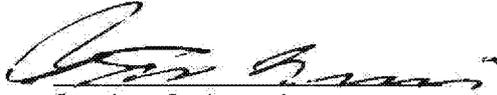
(9) Human Health and Ecological Risk Assessment

A Human Health and Ecological Risk Assessment will likely be conducted for Site closure purposes as there have been impacts, or potential impacts, to media other than soil or groundwater (i.e. surface water and sediments).

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Please do not hesitate to contact the undersigned if you have any questions or comments regarding this IRA.

Sincerely,
SAGE Environmental, Inc.



Stephen R. Lemoine
Environmental Scientist



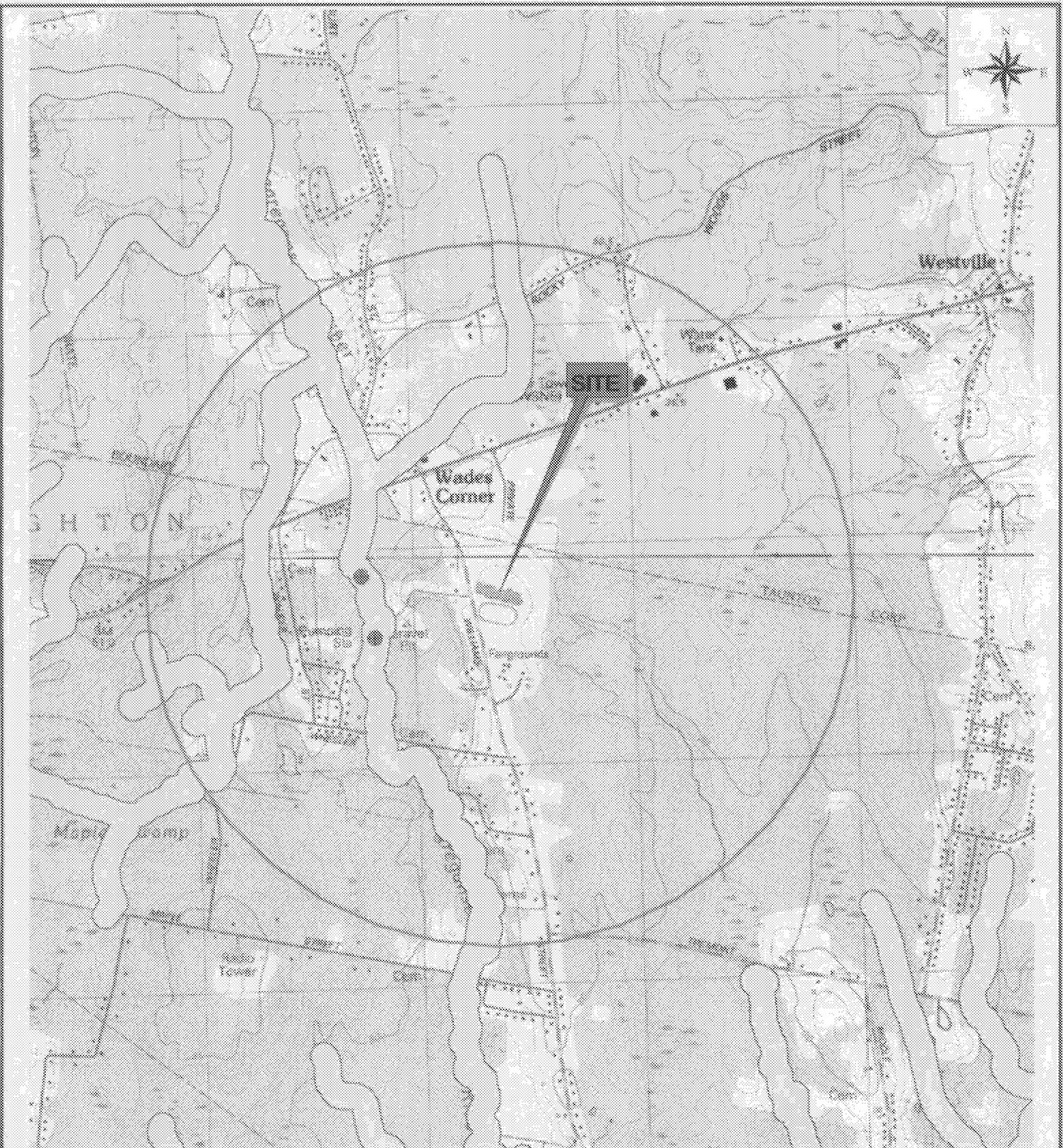
Matthew E. Hackman
Licensed Site Professional

SRL/MEH:car/jlp

Attachments

- C: Charles Pollina, American Auto Auction
- Kimberly Tisa, U.S. EPA
- Cathal O'Brien, Taunton Conservation Commission
- Hugh Willis, BHW Engineering, LLC

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FIGURE 1

- DEP Public Water Supply Well
- Zone A
- 1 Mile Radius

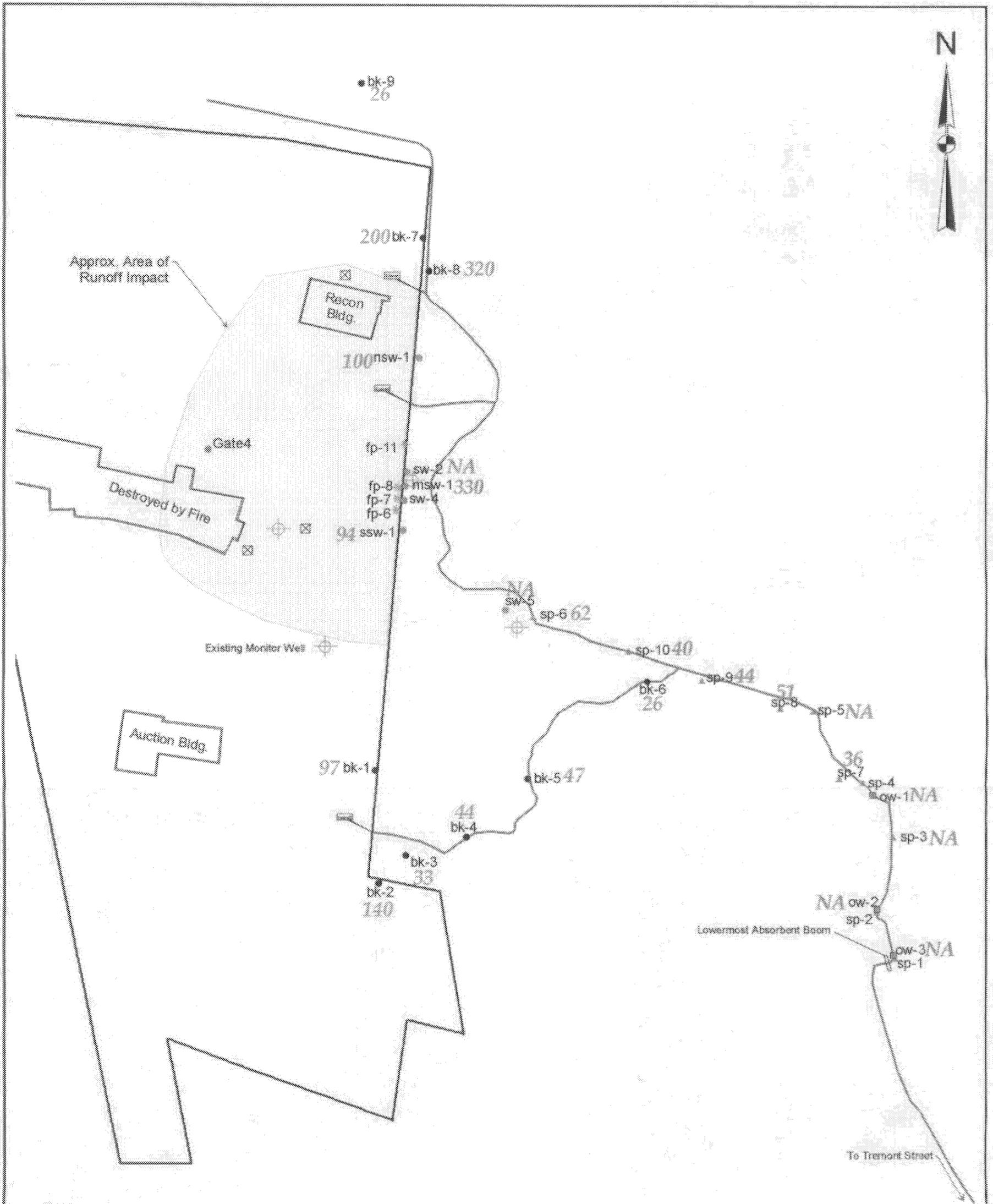


USGS QUADRANGLE
SOMERSET/NORTON, MA

USGS Quadrangle Site Location Plan
American Auto Auction
123 Williams Street
North Dighton, Massachusetts

DATE: 01/02/02 SAGE JOB # R035
 CREATED BY: CMM





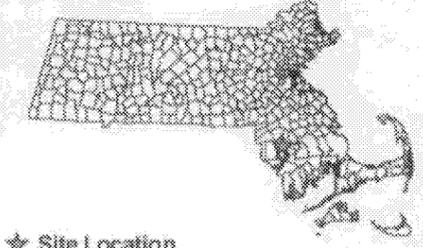
NOTES:
 NA = Not Analyzed for EPH parameters
 Green Values are background concentrations
 Red values are post-excitation concentrations

200 0 200 400 600 800 1000 1200 Feet

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FIGURE 2

- Sample Locations
- Gate
 - bk (background)
 - fp (Fence Post)
 - ow (sed/soil)
 - ▲ sp (sed/soil)
 - sw (sed/soil)
 - ▭ Buildings
 - ▭ Approximate Area of Runoff Impact
 - ▭ Parking Lot
 - ▭ Stream
 - ▭ Catch Basin
 - ⊕ Proposed Monitor Well



★ Site Location

Post-excitation Sediment/Soil Samples
 C11-C22 Aromatics (mg/kg)
 American Auto Auction
 123 Williams Street
 North Dighton, Massachusetts

DATE: 12/11/01 SAGE JOB #: R035
 CREATED BY: CMM